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MEMORANDUM

TO: All Approved Manufacturers and Third Party Inspection Agencies

FROM: Kimberly Spencer, Program Coordinator

DATE: March, 2006

This memorandum, along with its attachments, contains important information relative to the program. It shall be the responsibility of each manufacturer and Third Party Inspection Agent to read and understand all contents of this package.

A copy of **780 CMR R3**, the commonwealth's regulations pertaining to the manufactured building program. The regulation is provided for purposes of information. It is the responsibility of each manufacturer and TPIA to read and understand the contents of 780 CMR R3.

A **Transmittal Form** which must be completed and must accompany all correspondence forwarded to the Commonwealth. (This form has been revised and bears a March, 2004 date. Please discard all other transmittal forms.)

With the exception of Label Request forms and Third Party Certification Forms, the standard transmittal form is to accompany every piece of material that is forwarded to the BBRs\DPS. It shall be completed fully and clearly, including a signature so that this office can process this form in a timely manner.

A **BBRS\DPS Identification Number** is a sequential number which is assigned to each set of plans that is received by the BBRs\DPS. The number is assigned for purposes of tracking the plans, as well as the project history as it progresses through the process. A BBRs\DPS Identification Number is assigned all plans (whether or not such plans require review by this office) immediately upon receipt. This number, and information relating to the project, is entered into a computer database. Both the manufacturer and the TPIA will be forwarded a

form, via email, which is titled Plan Identification Number Assignment after this office has received a set of plans relative to the program. This form evidences receipt of the plans and establishes the BBRs\DPS Identification Number.

It is essential that manufacturers and TPIAs use this number on all follow-up correspondences to this office.

A Label Request Form. It shall be the duty of the manufacturer to complete and return this form to the Office of the Board of Building Regulations and Standards. This form must be completed in its entirety. Any incomplete forms will be returned and label orders will not be processed until the form is completed and returned. A manufacturer may forward Label Request Forms, along with payment, at any time **after** having received a BBRs\DPS Identification Number.

It is necessary to provide an exact street address on the Label Request Form for the proper functioning of the program so that we are able to track the exact location of all manufactured building units and labels. It is our intention to visit certain manufactured building sites periodically and randomly in an effort to ensure that field installation procedures meet the program requirements. A copy of the label Request is forwarded to the local inspector in that city or town.

Additionally, it is important to note that label orders will not be processed until the third Party Agency Certification Form is completed and in our possession. A TPIA form may be faxed into the office as long as the original form is immediately forwarded via U.S. Mail.

Upon receipt of the completed forms (Label Request form and Third Party Inspection Agency Certification Form), labels will be sent directly to the manufacturer for affixing to the building unit.

A Third Party Inspection Agency Certification Form. It shall be the duty of the Third Party Inspection Agency to complete and return this form to the Office of the Board of Building Regulations and Standards in attestation that the subject building units have been constructed to meet or exceed applicable Massachusetts building, electrical, plumbing and Architectural Access Board codes as applicable. **This office will not release labels for the units until this form is completed and in our possession.**

An Application for Bulk Labels. The BBRs has decided to reinstate the practice of ordering manufactured building labels in bulk. All labels will be shipped to the Third Party Inspection Agency. It is the responsibility of the Third Party Inspection Agency to complete and return the original **Third Party Inspection Agency Certification for Bulk Labels** form to the Office of the Board of Building Regulations and Standards as soon as the labels are affixed.

A copy of the **Commonwealth's Cover Sheet Requirements.** We continue to receive plans with insufficient or inaccurate information on the plan cover sheets. This document is provided as a reminder that all plan cover sheets shall provide at least the minimal information described herein. It is important to remember to provide a cover sheet with all plans to ensure expeditious processing. All plans that do not have a cover sheet will be returned.

A copy of the **Commonwealth's Minimum Plan Submission Requirements.** This sheet, too, is provided as a reminder of minimally acceptable plan submissions.

Additional Information:

Plan Review: In an effort to expedite plan approval time, plan review for all manufactured 1 and 2 family dwelling units (defined as R-4 structures, only and subject to the limitations of 780 CMR, Chapter 36); utility structures (including communication tower appurtenant equipment buildings); small storage buildings and business use buildings, each limited to a single use and built to a maximum of one story in height above grade and a maximum 3,500 square feet in area, shall be the responsibility of the manufacturer's Third Party Inspection Agent. The manufacturer shall provide a record set of all plans depicting these building types that are to be shipped to the Commonwealth. Department of Public Safety (DPS) personnel will perform random audits of a sufficient number of plan sets each year to ensure that Third Party Agencies are suitably reviewing plans for code conformance. **If it is determined that Third Party Agents have been derelict in this duty, the Department may recommend a hearing before the Board of Building Regulations and Standards.**

Plan review for all other manufactured building types shall remain in the control of DPS.

1 & 2 Family Dwelling Units (R-4 only) for Manufacturers of Systems Buildings:

- The stamp\seal of the **Third Party Inspection Agency** responsible for the plan review and in-plant inspection for that particular manufacturer shall appear on **all sheets** of the plan set;
- The stamp\seal of the registered professional engineer (P.E.) or architect, cover sheet only (A photocopy of this seal is acceptable for R-4 structures only),
- The stamp\seal of DPS\BBRS are not required on these types of buildings.

1 & 2 Family Dwelling Units (*which are* defined as R-4 structures and are subject to the limitations of 780 CMR, Chapter 36);

Utility Buildings (Use Group U - including communication tower appurtenant equipment buildings);

Small Business (Use Group B) and Storage Buildings (Use Group S) each limited to a single use and built to a maximum of one story in height above grade and a maximum 3,500 square feet in area - for Manufacturers of Model Specific Buildings:

- The stamp\seal of the **Third Party Inspection Agency** responsible for the plan review and in-plant inspection for that particular manufacturer shall appear on **all sheets** of the plan set;
- The stamp\seal of the registered professional engineer (P.E.) or architect on **all sheets**;
- The stamp\seal of DPS\BBRS are not required on these types of buildings

All Other Building Types Produced Via the Model Specific Approach:

- The stamp\seal of the **Third Party Inspection Agency** responsible for in-plant inspection for that particular manufacturer shall appear on **all sheets** of the plan set;
- The stamp\seal of the registered professional engineer (P.E.) or architect on **all sheets**;
- The stamp\seal of DPS\BBRS on the **cover sheet only**.

Labels

Building officials will not allow the placement of manufactured building products in the Commonwealth of Massachusetts that do not bear appropriate labels.

The regulation requires all building labels to be placed in a location that is clearly visible to the building official. Label locations shall be shown on the building plans. **Do not force the building official to hunt for labels. Make locations clearly evident on the plans.**

The regulation requires each box to be labeled. However, if it is impractical to conform to this requirement (i.e.: there is not an appropriate place for the labels to be affixed), the regulation allows grouping of labels, as long the grouped label location is clearly identified on the plans. **Otherwise, do not gang labels together on one box. If the building is comprised of four boxes, there shall be four labels, one on each box.**

Plans – Building officials continually struggle with generic plans. It is sometimes difficult to discern applicable details for a given structure, and a building official should not have to search or guess which details apply and which do not. **Also, plans must be legible.**

Construction Classification – The building code prescribes five types of building construction classifications. (Type 1 being [generally] the most resistive to the effects of fire, Type 5 being the least.)

It is critical to understand that a manufactured building product may be manufactured to serve as an addition to an existing building. If the addition is affixed to an existing structure of a superior construction type, the addition may very well downgrade the entire construction type of the structure, resulting in major difficulties. **Please be aware of construction types and the affects they may have, both for the manufactured product itself and the existing building if the manufactured unit is to be an addition.**

This issue arises quite often with additions to school buildings. The code allows buildings to be erected to certain size limitations relative to the building's construction type and occupant load. Logically, structures that afford significant fire-resistive ratings are allowed to be constructed to heights and areas greater than those that afford lesser fire-resistant ratings. If a type 5B building is added to a type 2A school building (exclusive of fire wall separation or other contributing factors) the result may be that the construction type of the entire structure is down-graded to type 5B. Consequently, the building may then exceed height and area limitations allowed by the code, a problem no one wants to face.

Site plans are now required for certain building types:

In the past, there have been re-occurring problems with certain building types in relation to their position on a building site. Proximity of exterior walls to lot lines raises concerns relative to fire resistance ratings of exterior walls. New building units that are situated so as to cause snow drifting can cause structural difficulties.

Most often, these concerns arise relative to educational (E-Use) buildings. Therefore, a simple site plan must be provided with all E-Use buildings. The site plan must identify dimensions to property lines, proximity of new buildings to existing buildings as well as heights of existing buildings. The site plan does not have to be certified by a registered professional engineer, but it does need to clearly identify those issues above.

Also, buildings that utilize the open perimeter option for building area increase must be accompanied by a site plan. For obvious reasons, a site plan shall be issued which depicts that, in fact, the building is provided the required open perimeter area.

Builder\Dealers – Who are they and who assumes responsibility should something go wrong? Dealers of manufactured building products **must be responsible for the products they sell, and manufacturers must honor their obligation to provide a quality product to consumers.** Neither may walk away from their responsibilities under the program.

Set Manuals – Set manuals that are specific to the building **must be shipped with the product!** Again, neither the building official nor the builder (certified installer) should have to search for details relative to the building before him\her.

Details – Adequate details must be provided, especially for often overlooked areas. An example may be the completion and finishing of the vertical joint formed when multiple units are fastened together. This joint must be made weather-tight to reduce air infiltration and to achieve required thermal performance ratings.

Also, firestopping along the mawall at each floor level must be clearly delineated, and markings for locations of plumbing vents which must be connected and extended through the roof must be clearly identified.

Define the duties – Specific duties must be made clear. If it is the duty of the certified installer to make the connections identified above, it should be made clear. If it is the duty of the licensed construction supervisor, that should be equally clear. **Choose one!**

Installer of the manufactured building or building component – The regulation requires all installers of manufactured buildings and building components to be certified by the manufacturer as competent to install their product. **This certification should mean something.**

Manufacturers should not be issuing certifications to installers simply to satisfy the regulation requirement. Certifications should be issued only to those installers who truly understand how that manufacturer's product is assembled. A sample letter of certification is attached to this memorandum.

Provide the necessary parts – Many manufactured building products require specialty items that should be provided with the units. An example may be the over-sized interior column top plate that is typically required for a manufactured single-family house. If the item is not provided with the unit, an installer may not be aware of its requirement and may install an item that is not necessarily designed for that purpose; or, smoke detectors that are required to be installed in a site built portion of the building (such as a basement or room over a garage). The smoke detection device must be tied to the building's overall detection system, and therefore, must be compatible with the other factory-installed devices.

Notification – The regulation requires the BBRS to be notified of the shipment of a manufactured building product and requires that a building official be notified 48 hours in advance of the placement of a manufactured building product. Please adhere to this requirement.

It is our objective to ensure that the manufactured buildings program runs smoothly and that products produced under its requirements are in keeping with standards of the program. However, this objective can only be accomplished jointly through the cooperative efforts of BBRS, DPS, TPIA and manufacturer's staff.

It is our hope that this information is clear. However, if you have any questions relating to these matters, please contact Kimberly Spencer at 508-898-0167, fax 508-898-2386 or email Kimberly.spencer@state.ma.us.